

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PENNSYLVANIA PUBLIC SCHOOL
EMPLOYEES' RETIREMENT SYSTEM,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

BANK OF AMERICA CORPORATION, et al.,

Defendants.

CIVIL ACTION NO.
11-CV-00733-WHP

CLASS ACTION

**LEAD PLAINTIFF'S
NOTICE OF MOTION FOR
PRELIMINARY APPROVAL
OF SETTLEMENT, APPROVAL
OF CLASS NOTICE AND
SCHEDULING OF FINAL
APPROVAL HEARING**

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PLEASE TAKE NOTICE that the Court-appointed Lead Plaintiff, the Commonwealth of Pennsylvania, Public School Employees' Retirement System ("PSERS" or "Lead Plaintiff"), on behalf of itself and the Certified Class, respectfully moves for: (i) preliminary approval of the settlement reached with all Defendants; (ii) approval of the form and substance of the proposed forms of Notice and directing that notice be given to prospective members of the Class; (iii) scheduling a hearing at which final approval of the Settlement, Plan of Allocation and an award of attorneys' fees and litigation expenses to Lead Counsel may be considered; and (iv) such additional or different relief as the interests of law, justice or equity may require.

Lead Plaintiff is contemporaneously filing a memorandum of law, which is incorporated as if fully set forth herein, in support of this motion.

A proposed order preliminarily approving proposed settlement and providing for notice is submitted herewith.

Dated: March 15, 2016

Respectfully submitted,

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